

1 Michael B. Bernacchi
California Bar No. 163657
2 (specially appearing)
BURKE, WILLIAMS & SORENSEN, LLP
3 444 South Flower Street, Suite 2400
Los Angeles, CA 90071-2953
4 Tel: 213.236.0600 | Fax: 213.236.2700
E-mail: mbernacchi@bwslaw.com
5
6 Attorneys for Defendant
Hartford Life and Accident Insurance Company
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 TOBY WALMSLEY,
12
13 Plaintiff,
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15 v.
16 HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, as Claims
17 Administrator of the Universal Health
Services, Inc. Long-Term Disability Plan;
DOES I through V; and ROE
CORPORATIONS I thru inclusive,
18
19 Defendants.

Case No. 2:19-cv-02028-JCM-EJY

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[First Request]

20 Plaintiff Toby Walmsley ("Plaintiff"), through her counsel, Julie A. Mersch of the Law
21 Office of Julie A. Mersch, and Defendant Hartford Life and Accident Insurance Company
22 ("Hartford"), through its counsel, Michael B. Bernacchi of the law firm of Burke, Williams &
23 Sorensen, LLP, hereby respectfully submit this Stipulation, Request and Order to Extend Time to
24 Answer or Otherwise Respond to Plaintiff's Complaint (the "Stipulation"). This Stipulation is
25 made in accordance with LR 6-1, LR 6-2, and LR II 7-1 of the Local Rules of this Court. This is
26 the first request for an extension of time to file an answer or otherwise respond to Plaintiff's
27 Complaint.

28 Hartford was served with Plaintiff's Complaint on November 26, 2019, making its current

responsive pleading due on or before December 17, 2019. The instant extension is requested as Hartford's counsel requires additional time for the following reasons: Hartford's counsel only became aware that the company was served with the complaint on December 9, 2019. He thus needs additional time to find local counsel, get admitted *pro hac vice* and review the file in order to prepare a responsive pleading to Plaintiff's Complaint and obtain local counsel, which may take some time given the complexity of the file and the intervening Christmas and New Year holidays.

Upon agreement by and between all the parties hereto as set forth herein, the undersigned respectfully requests this Court grant an extension of time, up to and including **January 16, 2020**, for Hartford to file an answer or otherwise respond to Plaintiff's Complaint. By entering into this Stipulation, none of the parties waived any rights they have under statute, law or rule with respect to Plaintiff's Complaint.

DATED this 12 day of December, 2019.

LAW OFFICE OF JULIE A. MERSCH
Julie A. Mersch

BURKE, WILLIAMS & SORENSEN, LLP
Michael B. Bernacchi

By: /s/ Julie A. Mersch
Julie A. Mersch
1100 East Bridger Avenue
Las Vegas, NV 89101

By: /s/ Michael B. Bernacchi
Michael B. Bernacchi
444 South Flower Street, Suite 2400
Los Angeles, CA 90071-2953

Attorneys for Plaintiff
Toby Walmsley

Specially Appearing as Attorneys for Defendant
Hartford Life And Accident Insurance Company

ORDER

IT IS SO ORDERED.

Dated: December 13, 2019

By: 
United States Magistrate Judge